

EXHIBIT D

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, APRIL MUNIZ, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, THOMAS BAKER and JOHN
DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-
KNIGHTS, LOYAL WHITE KNIGHTS OF THE
KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3: 17-cv-00072-NKM

**DECLARATION OF MARCUS MARTIN IN SUPPORT OF PLAINTIFFS’
SUBMISSION REGARDING VENUE FOR TRIAL AND TRIAL LOGISTICS**

I, Marcus Martin, declare as follows:

1. I am a Plaintiff in the lawsuit captioned *Sines v. Kessler*, No. No. 3: 17-cv-00072-NKM.
2. I provide this declaration in support of Plaintiffs' Submission Regarding Venue for Trial and Trial Logistics.
3. The statements made in this declaration are based on my personal knowledge. If called to testify, I could and would testify under oath competently and truthfully to each of the statements in this declaration.
4. I am a resident of Shipman, Virginia. I have lived in Shipman, Virginia for my entire life. Where I live in Shipman is approximately 30 minutes away from Charlottesville, Virginia.
5. I am employed by RSG Landscaping. I oversee landscaping projects located in Charlottesville, and I work and stay overnight in Charlottesville from Monday through Friday every week. I expect this will continue until at least the end of the year.
6. I assist in providing elder care for my mother, who also resides in Shipman. My mother cannot drive, and I regularly drive her to medical appointments when other family members are unable to do so.
7. Driving to Lynchburg or Roanoke on a daily basis would be extremely difficult for me. Driving for that length of time is painful for my leg, which was severely injured during the events in question. In fact, I previously attempted to drive to work in Lynchburg for a period of approximately two weeks, but the drive proved so difficult due to the pain in my leg and personal exhaustion that my employer arranged for me to work in Charlottesville and provides me with lodging in a Charlottesville hotel during the week. I do not have any family or friends

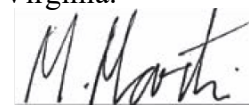
with whom I could stay in either Lynchburg or Roanoke.

8. Traveling to Lynchburg or Roanoke also would take me away from my support system, which includes my family and friends. I rely heavily on my support system to calm me down in times of stress. I do not have any kind of support system in either Lynchburg or Roanoke, and my entire support system is located in or around Charlottesville.

9. It is extremely important to me that the trial occur in Charlottesville so that the community can be involved in resolving this case. The events in question occurred in Charlottesville. The Defendants' conduct has left Charlottesville's community with scars and memories that will simply never go away. I cannot drive past the street where I was hit by Defendant Fields' vehicle without remembering exactly what happened. To move the trial to another location would take the trial away from the people of Charlottesville who need a sense of justice. Only by allowing a jury to resolve this case in Charlottesville can the community truly begin to heal.

10. It is substantially more convenient for me, given my employment in Charlottesville, my responsibility to care for my mother, and my difficulty driving for prolonged periods for trial in *Sines v. Kessler* to be held in Charlottesville instead of Lynchburg or Roanoke. Driving to Lynchburg or Roanoke for the trial would take me away from my work responsibilities in Charlottesville, prevent me from assisting in my mother's care, require me to secure lodging for myself, result in severe physical hardship, and deprive me of my support system.

11. I declare under penalty of perjury that the foregoing is true and correct. Executed on June 10, 2021 in Charlottesville, Virginia.

A handwritten signature in black ink, appearing to read "M. Martin", is written over a horizontal line.

Marcus Martin